

Sheriff

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March 30, 1993

Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D. C. 20554

Re: Opposition to FCC PR Docket Number 92-235
Spectrum Refarming

Dear Secretary Searcy:

As Captain of the Administrative Services Division which maintains responsibility of our agency's Communications Section, I strongly oppose the FCC proposed "Rule Making" in Docket 92-235, 57FR54034.

The issues addressed by the Commission relate only to the ease of achieving compliance by a "simple adjustment" of the transmitter and avoids completely the severe complications that will result in the receiver portion of the transceiver.

While an adjustment may be possible on the deviation and power to allow a transmitter to comply with the new specifications, the actuality remains that the new "emission mask" requirements will most probably not be met and therefore place the unit in violation of FCC regulations. When added to the reduction in transmit range that may be expected with the new limitations, it is obvious most transmitters will require replacement long before they are truly obsolete.

The FCC Commission has failed to adequately consider the effects on the receiver portion of the transceiver. Severe interference will occur with adjacent channel usage as the receiver allows narrow bandwidth transmitted signals to pass through the outmoded version of the receiver.

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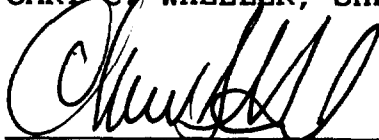
The recovered audio levels pose even more serious threats to the squelch circuits and their ability to perform even marginally, much less provide a usable level of recovered audio to the speaker. The avenue of spectrum management such as VHF and UHF trunking can achieve a similar increase in channel capacity in several bands and hopefully this will be considered.

The potential risk and safety factor and the crucial need to maintain a clear and open means of communication is our main concern for the law enforcement, medical and fire field units we serve. This safety factor would be greatly jeopardized if this rule making is approved.

Therefore I strongly urge the Commission to reconsider the proposed "Rule Making" to avoid "re-farming" and to allow a slow migration to a new technology.

Respectfully,

GARY C. WHEELER, SHERIFF



John Gisler, Captain
Administrative Services Division
Indian River County Sheriff's Office

CJG:cgc

cc: Sheriff Gary Wheeler
Undersheriff Jerry Winebrenner
Captain James Davis, Uniform Division
County Commissioners